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**From:** Arnold, Rick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A545BF3329054C1B8F0F65D0F45797DE-ARNOLD, LAR]  
**Sent:** 4/13/2020 2:49:39 PM  
**To:** Robinson, Valois [Robinson.Valois@epa.gov]  
**Subject:** RE: differences in stability monitoring duration between Tech Report and License

Interesting.  
Thanks.

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**From:** Robinson, Valois <Robinson.Valois@epa.gov>  
**Sent:** Monday, April 13, 2020 8:19 AM  
**To:** Arnold, Rick <Arnold.Rick@epa.gov>  
**Subject:** differences in stability monitoring duration between Tech Report and License

Hi Rick,  
I noticed the Technical Report says the stability monitoring period will last a minimum on 6 months, while the NRC License says

The applicant shall continue the stability monitoring until the data show that the most recent four consecutive quarters indicate no statistically significant increasing trend for all constituents of concern that would lead to an exceedance above the respective standard in 10 CFR Part 40, Appendix A, Criterion 5B(5).

The NRC Safety Evaluation Report has the same minimum time and further explains that 5 samples will be collected. In June 2011, Powertech submitted a large document in response to NRC's Request for Additional Information that changed a number of things in the Technical Report. Reference 2011a

#### **6.1.3.6 Restoration Stabilization Monitoring**

The applicant proposed a groundwater stability monitoring program consisting of 12 months with quarterly sampling (Powertech, 2011a). The applicant will collect 5 samples from each monitoring well, and stability will be assessed using average constituent concentrations for each wellfield. Hot spots will be evaluated based on the results from individual wells (Powertech, 2011a).

*Valois*

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Valois Robinson  
EPA Region 8  
Underground Injection Control Program  
MailCode: 8WD-SDU  
1595 Wynkoop Street  
Denver, CO 80202-1129  
(303) 312-6276  
[robinson.valois@epa.gov](mailto:robinson.valois@epa.gov)